

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

AHMAD AKBAR, a/k/a “Meech,”
TYRELL BEECHER, a/k/a “Shae,”
CHRISTOPHER BOVAIN, a/k/a “Cleko,”
WINNIS BRITO, a/k/a “Flaco,”
DONTA DOUGLAS,
DARNELL GREEN, a/k/a “Nellz,”
DOMINIQUE GREEN, a/k/a “Domo,”
MAURICE HARGROW, a/k/a “Moe Tally,”
JAHNICO HARVEY,
CHARLES HEWITT, a/k/a “Young Cee,”
KEVIN LEWIS, a/k/a “Mula,”
JAMA MOHAMOUD, a/k/a “JFK Jay,”
JAVIAN MOORE, a/k/a “Julio,”
JORDAN RUSSELL, a/k/a “J Rozay,”
JONATHAN SHORTT,
DEVON SMITH,
GEORGE THOMPSON,
LOUIS WILLIAMS, and
ISAIAH WISE FORDHAM, a/k/a “ZayBands,”

Defendants.

Protective Order

20 Cr. 563 (JPO)
S1 20 Cr. 563 (JPO)

Upon the application of the United States of America, with the consent of the undersigned counsel, the Court hereby finds and orders as follows:

Confidential Material. The Government will make disclosure to the defendants of documents, objects and information, including electronically stored information (“ESI”), pursuant to Federal Rule of Criminal Procedure 16, 18 U.S.C. §3500, and the Government’s general obligation to produce exculpatory and impeachment material in criminal case. Certain of that discovery may include material that (i) affects the privacy and confidentiality of individuals; (ii) would impede, if prematurely disclosed, the Government’s ongoing investigation of uncharged

individuals; (iii) would risk prejudicial pretrial publicity if publicly disseminated; and (iv) that is not authorized to be disclosed to the public or disclosed beyond that which is necessary for the defense of this criminal case. Discovery materials produced by the Government to the defendants or their counsel that are either (1) designated in whole or in part as “Confidential” by the Government in emails or communications to defense counsel, or (2) that include a Bates or other label stating “Confidential,” shall be deemed “Confidential Material.”

NOW, THEREFORE, FOR GOOD CAUSE SHOWN, IT IS HEREBY ORDERED:

1. Confidential Material shall not be disclosed by the defendant or defense counsel, including any successor counsel (“the defense”) other than as set forth herein, and shall be used by the defense solely for purposes of defending this action. The defense shall not post any Confidential Material on any Internet site or network site to which persons other than the parties hereto have access, and shall not disclose any Confidential Material to the media or any third party except as set forth below.

2. Confidential Material may be disclosed by counsel to:

- (a) Personnel for whose conduct counsel is responsible, *i.e.*, personnel employed by or retained by counsel, as needed for purposes of defending this action;
- (b) Prospective witnesses for purposes of defending this action.

3. The Government may authorize, in writing, disclosure of Confidential Material beyond that otherwise permitted by this Order without further Order of this Court.

4. This Order does not prevent the disclosure of any Confidential Material in any hearing or trial held in this action, or to any judge or magistrate judge, for purposes of this action. All filings should comply with the privacy protection provisions of Fed. R. Crim. P. 49.1.

5. Except for Confidential Material that has been made part of the record of this case, the defense shall return to the Government or securely destroy or delete all Confidential Material, including the seized ESI Confidential Material, within 30 days of the expiration of the period for direct appeal from any verdict in the above-captioned case; the period of direct appeal from any order dismissing any of the charges in the above-captioned case; or the granting of any motion made on behalf of the Government dismissing any charges in the above-captioned case, whichever date is later. This provision is subject to any applicable obligations to retain client files under the New York Rules of Professional Conduct.

6. The defense shall provide a copy of this Order to prospective witnesses and persons retained by counsel to whom the defense has disclosed Confidential Material. All such persons shall be subject to the terms of this Order. Defense counsel shall maintain a record of what Confidential Material has been disclosed to which such persons.

7. This Order places no restriction on a defendant's use or disclosure of ESI that originally belonged to the defendant.

Retention of Jurisdiction

8. The provisions of this order shall not terminate at the conclusion of this criminal prosecution and the Court will retain jurisdiction to enforce this Order following termination of the case.

AGREED AND CONSENTED TO:

AUDREY STRAUSS
Acting United States Attorney

_____/s/_____
Emily A. Johnson /
Kaylan E. Lasky /
Ashley C. Nicolas
Assistant United States Attorneys

Date: 11/30/2020

Dawn Cardi / Diane Ferrone
Counsel for Ahmad Akbar

Date: _____

Thomas Ambrosio
Counsel for Tyrell Beecher

Date: _____

Jesse Siegel
Counsel for Christopher Bovain

Date: _____

Dawn Florio
Counsel for Winnis Brito

Date: _____

Jeff Chabrowe
Counsel for Donta Douglas

Date: _____

Thomas Dunn
Counsel for Darnell Green

Date: _____


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AGREED AND CONSENTED TO:

AUDREY STRAUSS
Acting United States Attorney

Emily A. Johnson /
Kaylan E. Lasky /
Ashley C. Nicolas
Assistant United States Attorneys

Date: _____



Dawn Cardi / Diane Ferrone
Counsel for Ahmad Akbar

Date: 11/20/2020

Thomas Ambrosio
Counsel for Tyrell Beecher

Date: _____

Jesse Siegel
Counsel for Christopher Bovain

Date: _____

Dawn Florio
Counsel for Winnis Brito

Date: _____

Jeff Chabrowe
Counsel for Donta Douglas

Date: _____

Thomas Dunn
Counsel for Darnell Green

Date: _____

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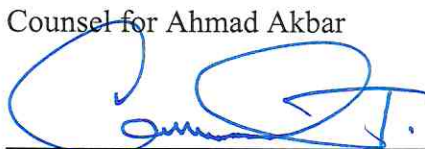
AUDREY STRAUSS
Acting United States Attorney

Emily A. Johnson /
Kaylan E. Lasky /
Ashley C. Nicolas
Assistant United States Attorneys

Date: _____

Dawn Cardì / Diane Ferrone
Counsel for Ahmad Akbar

Date: _____



Thomas Ambrosio
Counsel for Tyrell Beecher

Date: 11-18-2020

Jesse Siegel
Counsel for Christopher Bovain

Date: _____

Dawn Florio
Counsel for Winnis Brito

Date: _____

Jeff Chabrowe
Counsel for Donta Douglas

Date: _____

Thomas Dunn
Counsel for Darnell Green

Date: _____

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Date: _____

Dawn Cardi / Diane Ferrone
Counsel for Ahmad Akbar

Date: _____

Thomas Ambrosio
Counsel for Tyrell Beecher

Date: _____



Jesse Siegel
Counsel for Christopher Bovain

Date: 11/24/20

Dawn Florio
Counsel for Winnis Brito

Date: _____

Jeff Chabrowe
Counsel for Donta Douglas

Date: _____

Thomas Dunn

Date: _____

AGREED AND CONSENTED TO:

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Acting United States Attorney

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Ashley C. Nicolas
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Date: _____

Dawn Cardi / Diane Ferrone
Counsel for Ahmad Akbar

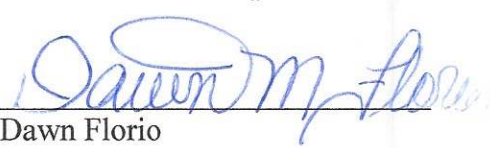
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Thomas Ambrosio
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Jeff Chabrowe
Counsel for Donta Douglas

Dd: 11/24/20

Thomas Dunn
Counsel for Darnell Green

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Ken Womble
Counsel for Dominique Green

Calvin Scholar
Counsel for Maurice Hargrow

Mehdi Essmadi
Counsel for Jahnico Harvey

Matt Kluger
Counsel for Charles Hewitt

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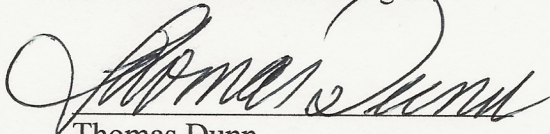
Date: _____

Dawn Florio
Counsel for Winnis Brito

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Jeff Chabrowe
Counsel for Donta Douglas

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Thomas Dunn
Counsel for Darnell Green

Date: 11/29/2022

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Ken Womble

Ken Womble
Counsel for Dominique Green

Date: Nov. 19, 2020

Calvin Scholar
Counsel for Maurice Hargrow

Date: _____

Mehdi Essmadi
Counsel for Jahnico Harvey

Date: _____

Matt Kluger
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Date: _____

Ezra Spilke
Counsel for Kevin Lewis

Date: _____

Jeffrey Pittell
Counsel for Jama Mohamoud

Date: _____

André G. Travieso
Counsel for Javian Moore

Date: _____

Deborah Colson
Counsel for Jordan Russell

Date: _____

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Ken Womble
Counsel for Dominique Green

Date: _____

Calvin H. Scholar

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email=chscholar@aol.com, c=US
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Date: _____

Calvin Scholar
Counsel for Maurice Hargrow

Mehdi Essmidi
Counsel for Jahnico Harvey

Date: _____

Matt Kluger
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Date: November 18, 2020

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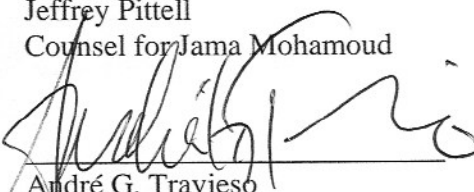
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Jeffrey Pittell
Counsel for Jama Mohamoud

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André G. Travieso
Counsel for Javian Moore

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Counsel for Jordan Russell

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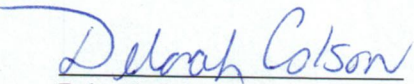
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Jeffrey Pittell
Counsel for Jama Mohamoud

Date: _____

André G. Travieso
Counsel for Javian Moore

Date: _____


Deborah Colson
Counsel for Jordan Russell

Date: 11/20/20

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Stephen Drummond
Counsel for Jonathan Shortt

Date: _____

Valerie Gotlib
Counsel for Devon Smith

Date: _____

Zachary Taylor
Counsel for George Thompson

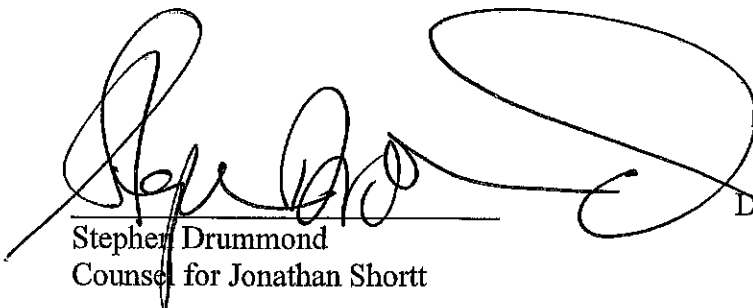
Date: _____

Harold Ramsey
Counsel for Louis Williams

Date: _____

David Bertan
Counsel for Isaiah Wise Fordham

Date: _____



Stephen Drummond
Counsel for Jonathan Shortt

Date: Nov. 25, 2020

Valerie Gotlib
Counsel for Devon Smith

Date: _____

Zachary Taylor
Counsel for George Thompson

Date: _____

Harold Ramsey
Counsel for Louis Williams

Date: _____

David Bertan
Counsel for Isaiah Wise Fordham

Date: _____


SO ORDERED:

Dated: New York, New York
November __, 2020

THE HON. J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE

Stephen Drummond
Counsel for Jonathan Shortt

Date: _____



Valerie Gotlib
Counsel for Devon Smith

Date: 11/24/2020

Zachary Taylor
Counsel for George Thompson

Date: _____

Harold Ramsey
Counsel for Louis Williams

Date: _____

David Bertan
Counsel for Isaiah Wise Fordham

Date: _____

SO ORDERED:

Dated: New York, New York
November __, 2020


THE HON. J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE

Stephen Drummond
Counsel for Jonathan Shortt

Date: _____

Valerie Gotlib
Counsel for Devon Smith

Date: _____



Zachary Taylor
Counsel for George Thompson

Date: 11/23/2020

Harold Ramsey
Counsel for Louis Williams

Date: _____

David Bertan
Counsel for Isaiah Wise Fordham

Date: _____

SO ORDERED:

Dated: New York, New York
November __, 2020

THE HON. J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE

Stephen Drummond
Counsel for Jonathan Shortt

Date: _____

Valerie Gotlib
Counsel for Devon Smith

Date: _____

Zachary Taylor
Counsel for George Thompson

Date: _____

/s/ Harold Ramsey

11-20-2020

Harold Ramsey
Counsel for Louis Williams

Date: _____

David Bertan
Counsel for Isaiah Wise Fordham

Date: _____

SO ORDERED:

Dated: New York, New York
November __, 2020

THE HON. J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE

Stephen Drummond
Counsel for Jonathan Shortt

Date: _____

Valerie Gotlib
Counsel for Devon Smith

Date: _____

Zachary Taylor
Counsel for George Thompson

Date: _____

Harold Ramsey
Counsel for Louis Williams

Date: _____



David Bertan
Counsel for Isaiah Wise Fordham

Date: November 29, 2020

SO ORDERED:

Dated: New York, New York
November 30, 2020



J. PAUL OETKEN
United States District Judge